ONLINE OSHA INJURY REPORTING REQUIREMENTS:

An old Obama era rule is finally coming into effect in 2024. Much of the Illinois state OSHA program for public entity employers mirrors the federal OSHA rules. Because of this, the Illinois Department of Labor (IDOL) under the IL OSHA program now requires state and local government employers meeting specific criteria to electronically report certain employee injury and illness data annually through an online portal.

IDOL has laid out information on this per their press release in January 2024:

**Step 1: Maintain injury and illness recordkeeping at the establishment level.**

Employers must maintain injury and illness records at the establishment level. Departments within an organization can usually function as establishments. For example, a city would not maintain a single set of injury and illness records. Instead, they would maintain separate records for the fire department, the police department, the street department, etc. Recordkeeping forms can be found [here.](https://www.osha.gov/recordkeeping/forms)

**Step 2: Determine the number of employees per establishment.**

For example, a city may have 25 employees in the fire department, 30 employees in the police department, etc. Part-time, temporary, and seasonal employees must also be included.

**Step 3: Determine if any establishments are required to electronically report.**

-Establishments with **250 or more** employees must electronically report data from their OSHA Form 300A Annual Summary. For example, if a city has a department (establishment) with 275 employees, the city must electronically report Form 300A data for that department.

-High-hazard establishments (see below) with **20 or more** employees must electronically report their OSHA Form 300A Annual Summary.

237310 – Road Maintenance/Construction (street/highway depts., road & bridge districts)

922160 – Local Fire Protection (fire depts., fire districts)

221310 – Water Supply/Distribution (water depts., water districts)

221320 – Sewage Treatment (sewer depts., wastewater treatment plants, sanitary districts)

-High-hazard establishments (see above) with **100 or more** employees must electronically report their OSHA Form 300A Annual Summary **and** each recordable injury and illness entered on their OSHA Form 300 Log with information from the Form 301 Incident Report or Illinois Form 45.

**Step 4: Electronically report.**

Employers meeting criteria in Step 3 must report through federal OSHA’s [Injury Tracking Application](https://www.osha.gov/injuryreporting/ita/) [(ITA) online portal](https://www.osha.gov/injuryreporting/ita/) **no later than March 2nd for the prior calendar year.**

**Additional Resources**

Federal OSHA has provided a specific [resource page](https://www.osha.gov/recordkeeping/final-rule) and [FAQ](https://www.osha.gov/injuryreporting) regarding this reporting requirement. For technical issues related to the online portal, please complete a [Help Request Form](https://www.osha.gov/injuryreporting/ita/help-request-form).

Contact IL OSHA at [dol.safety@illinois.gov](file://ILLINOIS/CMS/DOL/Illinois%20OSHA%20Managers/Division%20Manager/Letterhead/dol.safety%40illinois.gov) or at (217) 782-9386 for questions or clarification on recordkeeping and reporting. More information is also posted about this at <https://labor.illinois.gov/laws-rules/safety.html>

IPMG can assist ICRMT members that have workers compensation coverage in providing some record keeping help through our InSight claims system OSHA 300 and 300A support. Contact use for access or training to that information.